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Subject: The Effects of 2,4-D in a Two-Generation Study
on Reproduction in Rats.

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The 2-generation rat reproduction feeding study on 2,4-D has been reviewed and classified as Core-minimum data. The calculated and nominal NOEL's and the LEL's with their respective effects are as follows.

F0 parental toxicity.

NOEL - 15(20) mg/kg/day.*

LEL - 58(80) mg/kg/day, reduced male body weight.

F1 parental toxicity.

NOEL - 4(5) mg/kg/day.

LEL - 14(20) mg/kg/day, reduced female body weight.

Developmental toxicity, dose level to dams.

NOEL - 7(5) mg/kg/day.

LEL - 26(20) mg/kg/day, reduced weight in Flb pups.

Nominal dose levels administered 0, 5, 20, or 80 mg/kg/day.

* Calculated lowest dose level within the range consumed by the animals at the nominal dose level administered (nominal dose level administered).

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DATA EVALUATION REPORT

STUDY TYPE: Effects of 2,4-D on Two-Generations of Reproduction
in Rats

TEST SUBSTANCE: 2,4-Dichlorophenoxyacetic Acid (2,4-D)

SYNONYMS: 2,4-D TOX. CHEM. NO. 315

ACCESSION NO.: 259442-6 (Study in 5 Volumes)

SPONSOR: Industry Task Force on 2,4-D Research Data (ITF)

TESTING FACILITY: Wil Research Laboratories, Inc. (WIL)
Ashland, OH 44805-9281

TITLE OF REPORT: A Dietary Two-Generation Reproduction Study
in Fischer 344 Rats with 2,4-Dichlorophenoxy-
acetic Acid.

AUTHORS: Stanley Kopp, Patricia L Leist, Michael D
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Mark D Nemec, Dean E Rodwell.

STUDY NO.: WIL-81137

TESTING PERIOD: November 16, 1982 to May 15, 1984

REPORT ISSUED: July 26, 1985

PURITY OF TEST SUBSTANCE: ITF analysis 97.5%
WIL analysis 95.8%

CORE GRADE: Minimum.

A. CONCLUSIONS ON THE EFFECT AND NO EFFECT LEVELS:

The effect levels and no effect levels are expressed as the lowest dose level consumed within a measured dose level range. The target or nominal dose levels administered, for reference purposes only, are enclosed in parentheses (Discussed more fully in the section on Study Design and Conduct). Dose levels are given in mg/kg/day.

LEL and NOEL is expressed in mg/kg/day

F0 parental toxicity

LEL- 58(80), reduced body weight.

NOEL- 15(20)

F1 parental toxicity

LEL- 14(20), reduced body weight.

NOEL- 3.8(5)

Developmental toxicity

LEL- 26(20), Flb pup weight reduction.

NOEL- 7.2(5)

Target or nominal dose levels administered in the study are 0, 5, 20, or 80 mg/kg/day.

In designating the LEL and the NOEL, several considerations were applied. The lowest dose level in a range was used. Although it might be expected that the highest dose level within a range would initiate the toxicity, in a study on reproduction, where effects may be development stage or age specific as well as dose dependent, the highest dose level is not totally appropriate. In the study under consideration, the dose levels consumed varied widely during the study, and it was not always possible to determine adequately the dose level or the animal state at which the toxicity was initiated. Thus, it seems appropriate to select, for the LEL, the lowest dose level possibly resulting in the effect.

The NOEL is also designated as the lowest dose level in the range where no effects were observed. The upper dose level of the range was rejected because the animals did not continuously consume these levels. If they had, effects may have been demonstrated. Thus, for safety considerations, the lowest dose level within the range where no effects were observed is designated the NOEL.

The appropriate dose level range for the NOEL for the F1 female body weight reduction includes; a) the gestation and lactation for the Flb pups (the F1 females were selected from these pups), b) and the growth and development of the F1 females, c) and the gestation and lactation for the F2a and F2b litters, e) and for the 4 weeks of dosing after weaning the F2b litters. The lowest dose level consumed during these periods is considered to be the NOEL.

Similarly, the NOEL for the Flb pups is the lowest dose level consumed by F0 dams during the gestation and lactation for the Flb litters.

The effect and no effect levels from this study are also presented as the target dose levels and the range in the amount of test substance consumed. The target dose levels are the dose levels which were designed for the study and which the testing laboratory attempted to deliver to the animals. The amounts of test substance consumed are the actual dose-levels delivered to the animals, at least as best could be determined from the concentration of the test substance in the feed, food consumption, and the animal weight for the week concerned. Since the dose levels are calculated for 1 week before they are delivered, the actual delivered dose varied somewhat from these anticipated dose-levels during the study.

Effect and No Effect Levels, with ranges

F0 parental LEL and NOEL in mg/kg/day

- LEL- 80(58-94)(a)(b), F0 male body weight reduction.
- 80(71-86)(b), F0 female body weight reduction.
- 80(69-114)(c), F0 increase in length of gestation.
- NONE, F0 and F1 fertility.
- NOEL- 20(15-22)(b), No F0 male body weight reduction occurred.
- 20(18-21)(b), No F0 female body weight reduction,
- 20(18-35)(c) or no increased length of gestation occurred.

F1 parental LEL and NOEL in mg/kg/day

- LEL- 20(14-48)(d), F1 female body weight reduction.
- NOEL- 5(3.8-13.5)(d), No F1 female body weight reduction occurred.

Developmental toxicity in mg/kg/day to dams

- LEL- 80(69-112, gestation and lactation for the Fla litters)(e), Fla pup death.
- 80(103-133, gestation and lactation for the Flb litters)(e), Flb pup death.
- 80(69-112, gestation and lactation for the Fla litters)(e), Fla reduced pup weight.
- 20(26-48, gestation and lactation for the Flb litters)(e), Flb reduced pup weight.
- 80(103-114, gestation producing the Flb litters)(e), Flb skeletal anomalies, and reduced ossification, the only dose level studied.
- NOEL- 5(7.2-13.5, gestation and lactation for the Flb litters)(e), for all developmental effects.

Discounted effects and toxicity

- F0 male liver and liver/body weight ratio reduction at all dose levels.
- F0 female kidney and kidney/body weight ratio increase at all dose levels.

The following dose levels were administered.

F0 males(f)
5(3.7-6.1)
20(14.9-24.5)
80(57.7-103.7)

F0 females(f)
5(4.2-8.6)
20(17.8-29.5)
80(70.7-124.5)

F1 males(f)
5(4.7-5.6)
20(18-23)
80(9)

F1 females(f)
5(4.5-6.0)
20(19-24)

- (a) Target dose level(range in amount of test substance consumed, except during gestation and/or lactation, unless noted)
- (b) Includes test substance consumption prior to mating only.
- (c) Includes test substance consumption prior to mating, through gestation and lactation for the Fl_a litters and the gestation producing the Fl_b litters, the only gestation for which the effect was noted.
- (d) Includes test substance consumption throughout life time of the the F1 generation, which includes the Fl_b, F2_a, and F2_b litters.
- (e) Includes test substance consumption only during the period/s indicated.
- (f) Target dose levels administered(range in test substance consumption for the test animals indicated, except for gestation and lactation) in mg/kg/day.
- (g) Due to excess toxicity the Fl_b litters, the highest dose level was not continued beyond weaning.

The dose levels were set at 50% of the premating dose during the second week of lactation and 33% of the premating dose during the third and forth week of lactation. This somewhat arbitrary setting of dose-levels during midlactation and end lactation, has merit but needs evaluation for its impact on Agency assessment of reproductive effects. Also, the consequence of the reduced dosing to young animals when the study was initiated and just after weaning needs evaluation. Animals eat approximately twice as much food as they do as adults during the first 2-3 weeks post-weaning. Thus, they consumed less test substance in this study than would have if the concentration of the test substance in the feed had not been adjusted for body weight.

B. Conclusions

Toxicity was expressed in the Flb pups and in F1 females at dose levels lower than those administered to the F0 parents. Pup death occurred at birth and before lactation day 4 in Fla and Flb litters at the highest dose level which caused slight but statistically significant reduced weight gain in the F0 parents. Because of the toxicity to the pups at this target dose level of 80 mg/kg/day, this dose level was dropped from the study after weaning the remaining Flb pups. Reduced weight gain occurred in Flb pups during lactation at the middle dose level. At this same dose level, the Flb female pups, which became the F1 female generation, demonstrated a reduced body weight compared with controls during the last 4 weeks before sacrifice, but after weaning the F2b pups No significant effects occurred in any pups or any animals at the lowest target dose level. No reduced food consumption occurred to explain any of these effects on weights.

At all dose levels, absolute and relative liver weights were statistically significantly less than controls in F0 males and absolute and relative kidney weights at all dose levels were statistically significantly greater than controls in F0 females. These statistically significant effects did not demonstrate "smooth" dose response curves, and the effects were not confirmed in the F1 generation or in the histological examination of these organs. The report did not consider them to be biologically significant.

The toxicological significance of these effects are discounted. The liver weight reduction was not seen in 90 day subchronic and chronic studies conducted in this species and strain of rats. The increased kidney weights are also discounted because the kidney weights of 5 female controls were lower than the kidney weights of the remaining control animals of the F0 generation by approximately 3 standard deviations. If these animals are excluded from the average, then the kidney weights of dosed animals are comparable to the kidney weights of the remaining animals in the control group.

The LEL for development is reduced pup weight compared to controls during gestation and lactation of F0 dams at a target dose level of 20 mg/kg/day or a dose level range of

26-48 mg/kg/day. At the highest dose level, pup viability was reduced in the Fl_a and Fl_b litters. The NOEL for the reduced pup weight in the Fl_b litters compared to controls is a dose range of 7.2-13.5 mg/kg/day during gestation and lactation of F₀ females.

Since the liver weight decrease in males, and the kidney weight increase in females is not considered biologically significant, the LEL in adults is in Fl females at the target dose level of 20 mg/kg/day, where statistically significant weight depression compared to controls occurred during the last 4 weeks before sacrifice, but after weaning the F_{2b} pups. The NOEL for Fl adults then would be the target dose level of 5 mg/kg/day, the same target dose level as the NOEL for the Fl_b pup weight reduction. However, the range of dose levels consumed differed (see LEL and NOEL above).

No effects were seen on fertility in the F₀ or the Fl males or females.

C. Study Design and Conduct

The study was conducted essentially according to the OPP guidelines proposed August 22, 1978, for a two-generation, two litters per generation study of reproduction. The quality assurance statement was signed the director of quality assurance, Ralph Anderson, on 7/26/85.

About 140 Fischer 344 rats per sex were obtained from Charles River Breeding Laboratories, Inc, Kinston, NY on November 3, 1982, and quarantined for 13 days. Assignment of 30 rats per group were based on random selection of rats in a block design for body weight stratification. Animals were housed individually under recommended conditions.

The F₀ generation was placed on diets designed to deliver dose levels of 0, 5, 20, or 80 mg/kg/day, respectively, to each group, each of 30 rats per sex, for 105 days prior to mating. Subsequently, the animals were dosed in an analogous manner during each mating, each gestation, and each lactation. The total dosing and continuous dosing period for F₀ animals was 40 weeks which included 2 weeks rest between the end of lactation for the Fl_a litters to the beginning of mating for the Fl_b litters and 30 days after weaning these latter litters.

The Fl generation, selected from the Fl_b pups, was exposed to the test substance in utero, and continuously via the

milk or the feed for 125 days postnatally and prior to mating and through mating, gestation and lactation for the F2a litters. Dosing continued through a 2 week rest period and mating, gestation, lactation for the F2b litters and for at least 30 days after weaning the F2b litters.

The total period of continuous administration of the test substance, from initial dosing of the F0 generation to the end of the F1 generation, was 77 weeks. During this period, the test substance was administered to the F0 generation, Fla and Flb litters, the F1 generation (selected from Flb litters), including the F2a and F2b litters and for 30 days after weaning the F2b litters.

The test substance was administered in the feed at target dose levels of 5, 20, or 80 mg/kg/day. The concentration in the feed was adjusted weekly according to the food consumption during the previous week and the average body weight for that week. This regimen was followed in the F0 generation up to week 15 (105 days) or just prior to mating to produce the Fla litters. Except as indicated below, monthly adjustments were made after mating. During mating, males and females were exposed to the diet prepared for the females which was based on the concentration prepared for the week prior to mating (week 15 for the F0 matings). The same dietary concentration was used throughout mating, gestation, and the first week of lactation. During the second week of lactation, the dietary concentration was reduced by 50 percent and during the third and fourth weeks of lactation, the dietary concentration was reduced by 67 percent of diet concentrations used during the first week of gestation (a concentration based on week 15). A similar dosing regimen was followed in producing the Flb litters, except the dosing regimen was based on body weights for week 24 and food consumption for week 15. The actual dose level consumed during gestation and lactation are given in tables 1 and 2.

The report claimed that the food consumption for week 15 was actually for 6 days instead of 7, but that the average daily food consumption used for week 24 was incorrectly based on a 7 day week. Thus, the average daily food consumption for week 15 was calculated to be $86\% (6/7 = .86)$ of the actual daily average. This would result in the intended concentration of test substance in the feed during production of the Flb litters to be 86% of the actual feed concentration used during this period. The report did not make it clear whether or not this same error was made in the test substance concentration in the feed used during production of the Fla litters.

Table 1.

Test substance consumed during gestation in F0 and F1 dams producing Fla, Flb, F2a, and F2b litters.

		<u>Target dose levels in mg/kg/day</u>			
		<u>0</u>	<u>5</u>	<u>20</u>	<u>80</u>
Test substance consumed, in mg/kg/day, was calculated from the concentration, food consumption, and body weight.					
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F0 dams during the gestation producing the Fla					
	days 0-7	--	4.6	18.1	69.0
	days 7-13	--	5.0	20.5	79.6
	days 13-20	--	4.9	19.6	76.1
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F0 dams during the gestation producing the Flb					
	days 0-7	--	7.2	26.4	103.4
	days 7-13	--	8.0	29.4	113.8
	days 13-20	--	7.5	28.4	106.9
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F1 dams during the gestation producing the F2a					
	days 0-7	--	3.8	17.1	NC
	days 7-13	--	4.8	19.6	NC
	days 13-20	--	5.1	19.9	NC
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F1 dams during the gestation producing the F2b					
	days 0-7	--	3.9	14.2	NC
	days 7-13	--	4.8	18.1	NC
	days 13-20	--	4.7	16.7	NC

NC-Testing of the F1 generation was not continued at this dose level after weaning.

Table 2

Test substance consumed during lactation in F0 and F1 dams for Fla, Flb, F2a, and F2b litters.

		<u>Target dose levels in mg/kg/day</u>				
		<u>0</u>	<u>5</u>	<u>20</u>	<u>80</u>	
		<u>Test substance consumption in mg/kg/day calculated from concentration, food consumption, and body weight. (a)</u>				
F0 dams during lactation for Fla		days 1-7	--	8.9	34.7	112.3
	days 7-14	--	6.5	25.2	84.0	
	days 13-20	--	4.9	19.6	76.1	
	days 14-21	--	5.1	20.7	72.4	
	days 21-28	--	6.9	27.6	82.9	
F0 dams during lactation for Flb		days 1-7	--	13.5	47.8	132.7
	days 7-14	--	9.4	34.6	106.9	
	days 14-21	--	7.3	26.4	90.9	
	days 21-28	--	9.3	32.6	112.7	
F1 dams during lactation for F2a		days 1-7	--	8.2	34.0	NC
	days 7-14	--	5.9	24.6	NC	
	days 14-21	--	4.6	18.8	NC	
	days 21-28	--	7.0	29.1	NC	
F1 dams during lactation for F2b		days 1-7	--	7.6	28.5	NC
	days 7-14	--	5.6	20.6	NC	
	days 14-21	--	4.8	17.5	NC	
	days 21-28	--	6.6	25.2	NC	

NC-Testing of the F1 generation was not continued at this dose level after weaning.

- (a) Included in these values is the 50% reduction in the concentration of the test substance during the second week and the 67% reduction during the third and fourth week of lactation.

The Flb litters for the F1 generation remained on the reduced diet of lactation week 3 and 4 after weaning from the F0 dams. After selection for the F1 generation, pups were placed on test diets at target dose levels of 5 and 20 mg/kg/day, with weekly adjustments to week 53, the week prior to mating to produce the F2a litters. At this time, F1 males received the same diet as F1 females. Monthly adjustments were made to the diets after mating, except during the second week of lactation for the F2a and F2b litter when the concentration of the test substance was reduced by 50 percent and during the third and fourth weeks of lactation for the same litters when the concentrations of the test substance was reduced by 67 percent.

The study report did not specifically state how the doses were adjusted for the F1 generation but their dosing regimen can be calculated from the amounts of test substance consumed, and the body weights during the F1 generation for gestation and lactation for the F2a and F2b litters. The study report stated, "After selection, the F1 pups were placed on test diets at dose levels of 5 and 20 mg/kg/day." The study report also stated that adjustments were made to the diet based on food consumption and body weight.

These dosing regimens resulted in generally higher dose levels in the lactating F0 and F1 dams than for the premating target dose levels. The higher dose levels were greatest in F0 dams lactating for the Flb litters. Table 1 and 2 gives the amount of test substance consumed during gestation and lactation, respectively for Fla, Flb, F2a, and F2b litters. Consumption of test substance during gestation is included in table 1 because test substance consumption differed among these litters. The downward adjustment of the concentration in the feed during lactation did not occur during gestation. At other times the actual dose levels consumed were very close to the target dose levels.

The usual parameters were evaluated such as, fertility, duration of gestation, viability of pups at parturition and during lactation, the amount of food consumption, body weight, pup anomalies, and variations, in addition to histopathology on the testes, ovaries, kidneys, and livers. Organ weights were determined on the kidney, liver at necropsy and on testes after fixing in 10 percent formalin.

The following organs and tissues were taken at sacrifice and preserved, but histopathology was conducted only as previously indicated.

- | | |
|-------------------------------------------|----------------------------|
| 1. Adipose tissue | 19. Mammary Gland and Skin |
| 2. Adrenals | 20. Nasal turbinates |
| 3. Aorta | 21. Pancreas |
| 4. Bladder | 22. Parathyroids |
| 5. Bone marrow | 23. Pituitary |
| 6. Brain | 24. Prostate |
| 7. Cecum, colon | 25. Salivary Glands |
| 8. Spinal cord | 26. Sciatic Nerve |
| 9. Epididymis | 27. Seminal Vesicle |
| 10. Esophagus | 28. Skeletal Muscle |
| 11. Eyes | 29. Spinal Cord |
| 12. Ovaries/Testes | 30. Spleen |
| 13. Heart | 31. Sterum |
| 14. Intestines | 32. Stomach |
| 15. Kidneys | 33. Thymus |
| 16. Liver | 34. Thyroid |
| 17. Lung/bronchi | 35. Trachea |
| 18. Lymph node-thoracic
and mesenteric | 36. Uterus/cervix |
| | 37. Vagina |

Statistical Methods

All analyses were conducted using two-tailed tests (unless otherwise specified).

1. Histopathological findings and incidence by sex were compared to control groups by Kalmogorov-Smirnov one-tailed test.
2. F0 and F1 male and female fertility indexes, Fla, Flb, F2a, and F2b pup sex ratios on lactation day 1, and Fla, Flb, F2a, and F2b pup survival indexes on lactation day 4, 7, 14, 21, and 28 for the control groups were compared to each treated group by the Chi-square test with Yates correction factor.
3. Other effects in treated groups were compared to controls by analysis of variance followed by Dunnett's test.

Summary of Study Conduct

1. Test substance administered continuously throughout all phases of the study.
2. F0 dosed continuously from approx. 5 to 6 weeks of age for 105 days prior to first mating (i.e., approx. 20 weeks of age).
3. F0 mated 1:1 for 10 days and if no evidence of sperm, second matings were allowed with a proven male for 5 days.
4. F0 continued for 3 weeks of gestation and 4 weeks to weaning of Fla litters. Pups reduced to 8 per dam on day 4 of lactation.
5. All Fla litters necropsied and discarded after weaning.
6. F0 rested 2 weeks between weaning Fla and mating for production of the Flb as in #3.
7. F0 continued for 3 weeks gestation and 4 weeks to weaning of Flb litters. Pups reduced to 8 per dam on day 4 of lactation.
8. Ten Flb pups per sex per dose level randomly selected for necropsy, after weaning.
9. One pup per sex per dam per dose level randomly selected from Flb litters for the F1 generation. Because of excess toxicity at the target dose level of 80 mg/kg, only controls, and the target dose level groups of 5 and 20 mg/kg were continued on study. All Flb pups at 80 mg/kg/day were sacrificed at the end of weaning.
10. All F0 animals were sacrificed on week 40 of the study.
11. Selected F1 pups were dosed via milk and in the feed for 125 days prior to mating to produce the F2a litters.
12. Dosing, mating, gestation, and weaning in the F1 generation producing the F2a and F2b litters followed procedures, including necropsy, similar to those followed for the F0 generation in producing the Fla and Flb litters.

13. All F1 animals were sacrificed on week 77 of the study.
14. All Fla, Flb, F2a, and F2b dying prior to weaning were studied for malformations and variations.

D. Test Chemical Identity and Concentration in the Feed

The study report, presented an analysis conducted by Wil Research Laboratories, and the Industry Task Force analysis on 2,4-D. According to a Wil Research analysis, the test substance was 95.8 percent pure 2,4-D. The report presented the following analysis of the test substance by the task force, but no further analysis or explanation of the differences between the Task Force analysis of 97.5 percent, and the Wil Research analysis of 95.8 percent, was presented.

2,4-D

97.5%

ND = Not detected, (lowest level detectable).

Samples of the diets containing 2,4-D were collected for study weeks 0, 1, 2, 3, 4, 8, 13, 26, 39, 52, 65, 77. None of the sample diets were collected during weeks of gestation or lactation. The analyses after recovery of 2,4-D from the diets with the highest concentration were within 10 percent of the measured concentration. Analyses of 2,4-D in the diets at the middle dose level and the lowest dose level were always within 15 percent to 20 percent of the measured concentrations, except for three of the lowest dose levels which were 77 percent, 61 percent, and 55 percent of the measured dose levels. One was in a diet mixed on the 4th week of the study and two were for a diet mixed on the 13th week of the study. The 55 percent of the measured level was apparently a repeat analysis on a sample of the diet yielding the 61 percent of measured dose level.

E. Results

1. Fertility in F0 and F1 Males and Females.

No reduced fertility was expressed in males or females of the F0 generation in producing either the Fla or the Flb litters. However, a nonstatistically significant apparent reduction in male fertility occurred in producing the Flb litters (table 3). No reduced fertility was expressed in males or females of the F1 generation in producing the F2a and F2b litters. A second mating by a proven male was conducted when females demonstrated no evidence of sperm. The number of second matings producing the Fla/Flb pups were 0/6, 5/6, 1/2 and 0/2 for controls and the target dose levels of 5, 20, or 80 mg/kg/day, respectively. Second matings to produce F2a/F2b pups were 3/4, 2/1, and 4/4 for control and the target dose levels of 5, or 20 mg/kg/day.

The fertility index for production of the Fla and Flb litters is 70 to 79 percent in control F0 males and 70 to 79 percent in control F0 females (see table 3). The fertility index for males and females, respectively is the number of gravid females divided by the number males or females mated, respectively, adjusted to percent. These indexes ranged from 70 to 83 percent in treated males and 70 to 90 percent in treated females producing the Fla and Flb litters. Similarly, the fertility index for production of F2a and F2b litters is 60 to 70 percent in control F1 males and 64 to 72% in control F1 females (table 4.). These indexes range from 67 to 80 percent in treated F1 males and 64 to 80 percent in treated F1 females producing F2a and F2b litters. None were statistically significantly different from controls. The number of days required for mating ranged from 4.0 to 5.7 days of cohabitation to produce the Fla and Flb litters and 3.2 to 4.6 days of cohabitation to produce the F2a and F2b litters. These were no different from control values.

This failure to detect an effect on fertility is consistent with the lack of histopathological findings in the testes or epididymides of males and with the lack of histopathological findings in the ovaries or uteri of females from the F0 or F1 generation at terminal sacrifice. However, since the highest dose level was dropped from the study, fertility in the F1 generation was not evaluated at this dose level. Thus, the mid target dose level of 20 mg/kg/day should be considered the NOEL for fertility.

Table 3

Fertility indexes for F0 male and females producing Fla and Flb litters.

Fertility Index (no. gravid/no. males or females mated) x 100

Target dose	<u>Producing Fla</u>				<u>Producing Flb</u>			
	No. of males	%	No. of females	%	No. of males	%	No. of females	%
0	21/30	70	21/30	70	23/29	79	23/29	79
5	25/30	83	26/30	87	25/30	83	27/30	90
20	24/30	80	24/30	80	23/30	77	23/30	77
80	21/30	70	21/30	70	21/30	70	21/30	70

Table 4

Fertility indexes for F1 male and females producing F2a and F2b litters.

Fertility Index (no. gravid/no. males or females mated) x 100

Target dose	<u>Producing F2a</u>				<u>Producing F2b</u>			
	No. of males	%	No. of females	%	No. of males	%	No. of females	%
0	21/30	70	21/30	72	18/30	60	18/28	64
5	24/30	80	24/30	80	20/30	67	20/30	67
20	22/30	73	23/30	77	20/30	67	20/30	67

2. Length of Gestation in F0 and F1 Females

The lengths of gestation was statistically significantly prolonged in F0 females producing the Flb pups only and only at the highest target dose level of 80 mg/kg/day. This increase in gestational lengths was due to a gestation length of 23 days in approximately one half of the dams from this group instead of the usual 22 days of gestation demonstrated by most F0 and F1 dams in all groups. The LEL is between 103 and 114 mg/kg/day and NOEL is between 18 and 35 mg/kg/day.

The effect could result from delayed implantation, hormonal imbalance, or parturition problems. The effect is considered biologically significant and undesirable.

3. Body Weights of the F0 and F1 Generations.

The mean body weights of F0 males and female rats were statistically significantly less than controls in the high dose group only. In F0 males, the reduced body weight (97 percent of controls) was consistent after the sixth week of test substance consumption and in F0 females the body weight was consistently reduced (96 percent of controls) by the twelfth week of test substance consumption. The failure to gain as much weight as controls could not be attributed to reduced food consumption. The food consumption, and the food consumption per gram body weight gain was slightly increased. Body weights of the F0 generation in the target dose groups of 5 or 20 mg/kg were similar to control weights throughout this study, but food consumption appeared to be slightly elevated (not statistically significant).

F0 dams producing Fla and Flb litters had statistically significantly lower body weights than control weights on day 20 of the gestation producing the Fla and Flb litters in the highest dose group (table 5). At this dose level, body weights of dams were reduced on day 7, 13, and 20 of the gestation producing Fla litters, but the body weights of dams producing Flb litters were statistically significantly reduced only on day 20. Thus, toxicity was expressed in F0 dams during gestation of the Fla and Flb litters.

On lactation day 7, F0 dams lactating for Fla litters, express significantly reduced body weights in the highest dose group (table 5). For these dams, the body weight per gram of food consumed was about one half the value when compared to other dose groups and controls (data not shown). Dams demonstrated toxicity during lactation for the Fla, and for the Flb litters. At the end of lactation for the Fla and Flb litters, the body weights were statistically significantly elevated.

Table 5

F0 Female Body Weight (g) during gestation and lactation for Fla and Flb litters.

		Target Dose Levels (mg/kg/day)			
		0	5	20	80
Body wt. of F0 during gestation producing Fla					
Day	0	178	179	178	173
	7	190	191	191	181**
	13	208	208	206	196**
	20	246	252	249	232*
Body wt. of F0 during lactation for Fla					
Day	0	189	191	191	184
	7	205	207	201	189**
	14	212	212	207	208
	21	216	213	219	212
	28	189	184	185	204**
Body wt. of F0 during gestation producing Flb					
Day	0	200	205	202	197
	7	210	214	210	204
	13	226	232	230	218
	20	270	277	274	244**
Body wt. of F0 during lactation for Flb					
Day	0	210	215	208	205
	7	226	233	225	211*
	14	228	237	233	224
	21	229	239	234	231
	28	203	197	193	226*

*p < 0.005, Dunnett's Test.

**p < 0.01, Dunnett's Test.

Table 6

F1 Female Body Weight (g) during gestation and lactation for F2a and F2b litters.

Target Dose Levels (mg/kg/day)				
	0	5	20	
F1 during the gestation producing F2a				
Day 0	201	198	198	
7	211	208	211	
13	234	227	228	
20	271	271	270	
F1 during lactation for F2a				
Day 0	216	211	211	
7	228	221	222	
14	234	232	233	
21	232	233	236	
28	220	221	223	
F1 during gestation producing F2b				
Day 0	222	221	214*	
7	234	229	224*	
13	250	248	241	
20	293	290	278	
F1 during lactation for F2b				
Day 0	236	234	227*	
7	248	245	237	
14	260	245*	248	
21	255	252	250	
28	228	221	222	

*p < 0.05, Dunnett's Test.

The body weights of the F1 generation, after selection, was comparable to control body weights, except in females at the target dose level of 20 mg/kg during weeks 74 to 77 where they were statistically significantly less than controls (97 percent of controls). The report stated that these body weight reductions in females were not biologically significant. No explanation was presented.

The body weights of F1 females during gestation and lactation demonstrated no consistently significant patterns during production or lactation for the F2a or F2b litters (table 6), however they were statistically significantly reduced on day 0 and 7 of the gestation producing the F2b litters, and on day 0 of lactation for the the F2b litters.

4. Pup Weights from Fla, Flb, F2a, and F2b Litters

Pup weights were significantly reduced over control weights in the Fla (table 7) and Flb (table 8) pups only. Both male and female Fla and Flb pup weights were less than control weights from birth to lactation day 28 in the 80 mg/kg target dose group. At the next lower dose level, both Fla and Flb male and female pup weights tended to be apparently lower than control weights toward the end of lactation. By day 20 of lactation, both male and female pups in the Flb litters only demonstrated a statistically significant decrease in body weight over control weights. The male pup weight in Flb litters in the lowest dose group which were statistically significantly reduced on lactation day 28 may not be biologically significant, since there were no apparent differences from control weights throughout the previous weeks of lactation.

None of the F2a or F2b pup weights were found to be different from control weights.

Table 7
Summary of Fla litter weights (g)
males and females

Group No.	Dose Level (mg/kg/day)	Males Mean S.D.	<u>Lactation Days</u>						
			<u>1</u>	<u>4</u>	<u>4</u>	<u>7</u>	<u>14</u>	<u>21</u>	<u>28</u>
				Before Selection	After Selection				
1	0	Mean	5.5	7.7	8.0	11.9	22.5	32.6	51.8
		S.D.	0.83	1.50	1.06	1.15	1.72	2.81	6.33
2	5	Mean	5.6	7.9	7.9	11.8	22.1	31.7	48.8
		S.D.	0.71	1.20	1.22	1.83	2.67	3.06	6.37
3	20	Mean	5.6	7.9	7.9	11.8	21.3	30.9	48.0
		S.D.	0.61	0.71	0.71	0.80	2.26	2.59	5.62
4	80	Mean	4.9*	6.4**	6.4**	8.5**	17.2**	26.7**	39.1**
		S.D.	0.46	0.71	7.22	1.30	2.10	2.22	5.24
Group No.		Females							
1	0	Mean	5.2	7.5	7.7	11.4	21.7	31.1	48.8
		S.D.	0.72	1.41	0.94	1.03	1.91	2.87	5.25
2	5	Mean	5.4	7.7	7.7	11.5	21.5	30.5	46.0
		S.D.	0.73	1.24	1.25	1.76	2.55	2.74	5.47
3	20	Mean	5.4	7.7	7.7	11.5	20.7	30.0	46.0
		S.D.	0.75	0.58	0.59	0.66	2.27	2.79	5.28
4	80	Mean	4.7	6.3**	6.3**	8.5**	17.0**	26.5**	39.3**
		S.D.	0.39	0.85	0.85	1.46	2.57	3.10	6.30

* = Significantly different from control group at .05 level using Dunnett's test.

** = Significantly different from control group at .01 level using Dunnett's test.

Table 8
Summary of Flb litter weights (g)
Males and females on
lactation days

Group No.	Dose Level (mg/kg/day)	Males Mean S.D.	1	4	4	7	14	21	28
				Before Selection	After Selection				
1	0	Mean	5.8	8.5	8.5	12.4	23.9	34.6	56.0
		S.D.	0.43	0.77	0.77	1.17	2.31	3.58	8.87
2	5	Mean	5.6	8.4	8.4	12.5	23.9	34.3	50.6*
		S.D.	0.58	0.92	0.92	1.32	2.19	3.34	5.17
3	20	Mean	5.4	7.9*	7.9*	11.8	22.7	32.6	47.2**
		S.D.	0.50	0.63	0.63	0.86	1.18	2.34	7.26
4	80	Mean	4.5**	5.2**	5.2**	7.2**	15.9**	26.3**	41.1**
		S.D.	0.44	1.14	1.16	1.80	3.57	4.23	6.58

Group No.		Females							
1	0	Mean	5.3	8.1	8.1	11.7	22.5	32.3	51.0
		S.D.	0.46	0.83	0.83	1.11	1.89	2.95	7.52
2	5	Mean	5.3	8.0	8.0	11.9	22.9	32.6	47.4
		S.D.	0.59	0.83	0.84	1.19	1.79	2.59	4.56
3	20	Mean	5.2	7.6	7.6	11.2	21.7	30.9	44.2**
		S.D.	0.46	0.57	0.62	0.68	1.01	2.06	6.77
4	80	Mean	4.4**	5.6**	5.5**	7.2**	15.1**	25.0**	39.0**
		S.D.	0.54	0.83	0.80	1.23	1.00	0.91	1.47

* = Significantly different from control group at .05 level using Dunnett's test.

** = Significantly different from control group at .01 level using Dunnett's test.

The reduced Flb pup body weights in the mid dose level occurred from lactating dams demonstrating no statistically significant toxic signs at the time, although their body weights were apparently reduced from controls on lactation day 28. This may indicate that a change in the metabolism of 2,4-D occurred in F0 dams from production of the Fla to production of the Flb litters. Thus, dams exhibiting apparently no toxicity at the time, resulted in a reduction in pup weight over control weights.

5. Viability of Fla, Flb, F2a, and F2b Litters

The study demonstrated a statistically significantly reduced pup viability over controls only at the highest target dose level of 80 mg/kg (tables 9 and 10). The greatest reduction occurred in Flb pups at birth, with the mean litter size being about one half the control value due to deaths of portions and of entire litters. The mean litter size was reduced from five to three by day 14 of lactation, with no more deaths by lactation day 28 (table 10).

Some indication of reduced litter size was apparent in Fla litters of the target dose of 80 mg/kg, but the apparent decrease was not statistically significant (table 9). At birth however, there was a difference in the sex ratio of pups which was significant at the $p < 0.01$ level. From day 1 to day 28 of lactation, no further significant number of pup deaths occurred.

The study report stated that the decrease in female pups at births in Fla litters was not dose-related. I believe that it may be dose related, since at the highest test substance consumed by mothers producing Flb pups, where test substance consumption was higher than in dams producing the Fla litters, both male and female pup survival at birth were less in these Flb pups than the corresponding pup survival in the Fla pups. Thus, there appeared to be a dose response relationship.

Viability of the F2a and F2b pups was not affected.

6. Malformations and Variations

Flb pups which died before lactation day 28 were studied for malformation and variation. As can be seen from table 11, bent ribs, 14 the rudimentary ribs, malaligned sternebrae and unossified sternebrae were seen in the Flb pups. Since most of these pups died at birth or were dead by day 1 of lactation, the effects were seen primarily just after birth at the highest dose only and in the Flb pups only. This was the only group for which there were sufficient deaths, and animals could be necropsied. Only pups which died were available for necropsy except at weaning. These effects are

Table 9
Summary of Fla viability indexes

Group No.	No. Dead Pups	Sex Ratios Day 1 M:F	Live Litter Size		Gestation Survival Index		Day 4 Before Selection		Day 4 After Selection	
			No.	MEAN	No.	%	No.	%	No.	%
1	3	99:114	213/21	10.1	213/216	98.6	208/213	97.7	160/160	100.0
2	20	133:118	251/25	10.1	251/271**	92.6	247/251	98.4	191/191	100.0
3	3	121:116	237/24	9.9	237/240	98.8	237/237	100.0	183/183	100.0
4	9	109:71**	180/20	9.0	180/189	95.2	175/180	97.2	147/147	100.0

Group No.	Day 7		Day 14		Day 21		Day 28	
	No.	%	No.	%	No.	%	No.	%
1	156/160	97.5	156/160	97.5	156/160	97.5	156/160	97.5
2	190/191	99.5	190/191	99.5	190/191	99.5	190/191	99.5
3	183/183	100.0	183/183	100.0	183/183	100.0	183/183	100.0
4	146/147	99.3	143/147	97.3	143/147	97.3	143/147	97.3

1 - 0 mg/kg/day 2 - 5 mg/kg/day 3 - 20 mg/kg/day 4 - 80 mg/kg/day

Survival ratios and sex ratios compared using chi-square test.

Mean number of viable pups compared using analysis of variance.

** = Significantly different from control at .01 level.

Live litter size = No. pup alive on day 1 of lactation/no. litters.

Gestation index = No. pups alive on day 1 of lactation/total no. pups born.

Viability indexes = No. pups alive on day 4 before selection/no. pups alive day 1.

= No. pups alive day n/no. pups alive day 4 after selection.

Table 10
Summary of Flb viability indexes

Group No.	No. Dead Pups	Sex Ratios Day 1 M:F	Live Litter Size		Gestation Survival Index		Day 4 Before Selection		Day 4 After Selection	
			No.	MEAN	No.	%	No.	%	No.	%
1	5	112:107	219/23	9.5	219/224	97.8	219/219	100.0	164/164	100.0
2	15	120:131	251/25	10.0	251/266	94.4	246/251	98.0	177/177	100.0
3	3	110:128	238/23	10.4	238/241	98.8	237/238	99.6	174/174	100.0
4	110**	23:28	180/20	5.1**	51/161**	31.7	44/51**	86.3	42/42	100.0

Group No.	Day 7		Day 14		Day 21		Day 28	
	No.	%	No.	%	No.	%	No.	%
1	164/164	100.0	164/164	100.0	164/164	100.0	164/164	100.0
2	177/177	100.0	177/177	100.0	176/177	99.4	176/177	99.4
3	174/174	100.0	174/174	100.0	174/174	100.0	174/174	100.0
4	34/42**	81.0	30/42**	71.4	30/42**	71.4	30/42**	71.4

1 - 0 mg/kg/day 2 - 5 mg/kg/day 3 - 20 mg/kg/day 4 - 80 mg/kg/day

Survival and sex ratios compared using chi-square test.

Mean number of viable pups compared using analysis of variance.

** = Significantly different from control at .01 level.

Live litter size , gestation index and viability indexes = see legend table 9.

sometimes seen at dose levels causing maternal toxicity, but administration of many compounds do not cause these effects at maternally toxic dose levels.

The number of malformations and variations in these Flb pup dying prior to weaning were apparently not sufficient for statistical significance by the Fischer exact test. As can be seen from Table 11, 50 percent of the litters which died in the high dose group had, for example, malaligned sternbrae compared with 20 percent in controls. The adequacy of these statistical evaluations appear questionable and perhaps should be reevaluated by OPP. However, even if the number of anomalies and variations were significant in the high dose group, the failure to find significant numbers of these effects in five litters examined in each of the controls and the lowest dose group may indicate that these effects did not occur below the highest dose level.

If comparable examinations were conducted in all Fla pups, a dose relationship may have been apparent in the anomalies and variations. There is no indication that this was done. A detailed study on developmental effects on the Fla pups which died during lactation was conducted but these numbers were insufficient to establish a NOEL. If the Fla pups were preserved, it may have been useful to have examined them for a dose related response in developmental effects. However, by day 28 of lactation, all of the apparent effects analogous to those seen in the Flb pups shortly after birth may have disappeared.

Dose levels consumed by dams around the perinatal period were greater for the Flb litters than for the Fla litters. The week immediately before parturition, gestational day 13-20, the dams of the Fla pups consumed the test substance at a daily rate of 76.1 mg/kg, while the dams of the Flb pup, during the corresponding time period consumed 107 mg/kg. The daily consumption of test substance by dams during the first week of lactation for the Fla and Flb pups was 112 and 133 mg/kg, respectively, in the 80 mg/kg target dose level group.

Table 11.

Total Number of Pups and Litters with Developmental and Genetic Variations - Only Flb Pups Found Dead Lactation Days 0-28

Dose Group	Pups				Litters			
	1	2	3	4	1	2	3	4
Number Examined Externally Findings	5	15	3	103	5	5	3	18
	----None-----				----None-----			
Number Examined Viscerally Findings	5	15	3	103	5	5	3	18
	----None-----				----None-----			
Number Examined Skeletally	5	14	3	98	5	5	3	18
Sternebra #5 and/or #6 Unossified	0	0	0	7	0	0	0	5
Sternebrae #1, #2, #3 and/or #4 Unossified	0	0	0	1	0	0	0	1
Sternebrae Malaligned (slight or moderate)	1	0	0	23	1	0	0	9
14th Rudimentary Rib(s)	0	0	0	12	0	0	0	6
Bent Rib(s)	0	0	0	30	0	0	0	6
Reduced Ossification of the Vertebral Arches	0	0	0	2	0	0	0	2

None significantly different from control group using Fisher's Exact Test.

7. Organ Weights and Histological Studies

The absolute and relative liver weights were reduced at all dose levels in the F0 males (table 12). Only the liver/body weight ratios are presented. The absolute and relative kidney weights were increased at all dose levels in F0 females (table 12). The report did not consider the effects on organ weights to be dose-related in either sex. No explanation for this opinion or for these possible test substance related effects was presented. However, neither effect exhibited a smooth dose-related decrease or increase, respectively.

In the F1 generation relative kidney weight of the left but not the right kidney was significantly elevated in males at the 20 mg/kg target dose level only (table 13). The relative liver weights in males of this group were apparently elevated but not statistically. The relative liver weights were increased in F1 females of this dose group but the apparently slightly elevated kidney weights, probably, are not dose related (table 13). Thus, the possible organ weight effects in F1 generation failed to confirm the statistically significant organ weight effects seen in the F0 generation.

No organ weight effects or histopathology was seen in the testes from any dose level from any generation. No dose-related histological effects were seen in the ovary. Thyroids may have been saved but no histology was conducted on them. All the histological studies conducted failed to find any dose-related pathology in any of these organs in the F0 generation and the F1a, F1b, and F1 generation and F2a and F2b pups.

Two histological studies on the livers of the F0 animals were reported. One study was conducted by the testing facility (table 14), and the other was conducted by W. Ray Brown of Research Pathology Services, Inc., New Britain, P.A. (table 15).

When the livers from F0 males were examined histologically numbers of small foci of necrosis were found in all groups. This was initially diagnosed as Tyzzar's disease (table 14). This diagnosis was rejected because females were not affected, diarrhea was not detected, and survival was normal. Research Pathology Services found that small basophilic alterations in hepatocytes occurred at a slightly higher incidence in dosed animals (table 15). In females, these alterations occurred at a slightly higher incidence in controls. None of these histological findings were considered to be dose related by either pathologist.

Table 12.

F0 Terminal Body Weights and Relative Organ Weights

	Target Dose Levels mg/kg/day			
	<u>0</u>	<u>5</u>	<u>20</u>	<u>80</u>
F0 male bwt.	372.	373	368	354**
SD	15.4	17.8	18.3	19.5
F0 female bwt.	217	220	216	209**
SD	10.5	9.8	8.4	12.2
F0 male organ wt. per 100 g bwt.				
Lt Kidney	0.417	0.356**	0.421	0.435
SD	0.18	0.06	0.05	0.04
Rt Kidney	0.469	0.357**	0.420	0.429
SD	0.18	0.06	0.05	0.05
Liver	3.474	3.242**	3.337*	3.226**
SD	0.22	0.18	0.17	0.25
Testes	0.830	0.835	0.821	0.854
SD	0.04	0.04	0.05	0.08
F0 female organ wt. per 100 g bwt.				
Lt Kidney	0.351	0.471**	0.410*	0.425**
SD	0.14	0.12	0.05	0.04
Rt Kidney	0.361	0.476**	0.398	0.424
SD	0.15	0.11	0.06	0.04
Liver	3.477	3.663	3.608	3.627
SD	0.21	0.50	0.27	0.20

SD = Standard deviation; * = $p < 0.05$; ** = $p < 0.01$

Table 13.

F1 Terminal Body Weights and Organ Weight Ratios

	Target Dose Levels ^a mg/kg/day		
	0	5	20
F1 male bwt.	394.	388	386
SD	13.8	28.8	22.9
F1 female bwt.	238	231	231*
SD	9.8	9.0	11.1
F1 male organ wt. per 100 g bwt.			
Lt Kidney	0.394	0.381	0.411*
SD	0.025	0.03	0.02
Rt Kidney	0.390	0.378	0.402
SD	0.02	0.03	0.02
Liver	3.315	3.345	3.439
SD	0.25	0.25	0.17
Testes	0.865	0.857	0.861
SD	0.06	0.11	0.08
F1 female organ wt. per 100 g bwt.			
Lt Kidney	0.398	0.406	0.419
SD	0.03	0.04	0.03
Rt Kidney	0.402	0.400	0.415
SD	0.03	0.05	0.03
Liver	3.568	3.566	3.808**
SD	0.27	0.33	0.25

SD = Standard deviation; * = $p < 0.05$; ** = $p < 0.01$ ^aF1 at 80 mg/kg/day target dose level not dosed beyond weaning.

Table 14.

F0 histomorphological at terminal sacrifice.
Summary incidence for the live.
Testing laboratory summary.

Sex Dose group	Male				Female			
	1	2	3	4	1	2	3	4
Number of animals studied	30	30	30	30	29	29	30	29
Liver								
Total examined	30	30	30	30	29	29	30	29
Examined, unremarkable	6	3	9	13	20	22	20	17
Not examined	0	0	0	0	0	0	0	0
Cholangiofibrosis	21	20	19	14	5	3	5	5
Accessory lobe	1	1	0	3	2	1	0	3
Tyzzer's disease	4	18*	10	1	0	0	0	0
Nonspecific Kupffer cell granuloma	0	0	0	0	4	4	6	5
1= 0 mg/kg/day 2= 5 mg/kg/day 3= 20 mg/kg/day 4= 80 mg/kg/day								

* Significantly different from control at 0.05 level, using Kolmogorov-Smirnov, one-tailed test.

Table 15.

F0 histomorphological summary incidence
for liver, at terminal sacrifice.
Summary from Research Pathology Services

	Sex		Male				Female			
	Dose	group	1	2	3	4	1	2	3	4
Number examined	30		30	30	30	30	29	29	30	29
Number normal	1		29	23	24	24	9	7	12	8
Multifocal bile duct proliferation	25		29	23	24	24	9	7	7	11
Focal necrosis	11		2	1	3	3	1	1	1	0
Multifocal necrosis	13		19	15	11	11	0	0	0	0
Focal cellular alteration										
Basophilic-cell focus/foci	0		4	3	6	6	8	9	3	1
Clear-cell focus/foci	1		0	0	2	2	0	0	0	0
Eosinophilic-cell focus/foci	0		0	0	0	0	0	0	1	0
Microgranuloma/s	2		5	4	2	2	6	3	7	9
Multifocal mononuclear cellular infiltration	6		2	4	3	3	6	10	6	8
Accessory lobe	1		1	0	3	3	2	1	0	3
Centrilobular hepatocellular vacuolation	0		0	0	1	1	0	0	0	0
Focal hepatocellular vacuolation	1		0	0	0	0	0	0	0	0
Congestion	0		0	0	1	1	0	0	0	0
Congenital anomaly	0		0	0	0	0	1	0	0	0

8. Summary and Discussion

- 1) The study reviewed is a 2-generation, 2 litter per generation study of the effects of 2,4-dichlorophenoxy-acetic acid (2,4-D) on reproduction in Fischer 344 rats.
- 2) The test substance, (97.5% 2,4-D by an I.T.F analysis; and 95.8% 2,4-D by a WIL analysis) was administered in the feed, ad libitum, to 30 rats per sex per group. The concentration of the test substance was adjusted in the feed weekly or monthly according to food consumption and body weight in an attempt to meet target dose levels of 0, 5, 20 or 80 mg/kg/day. During gestation and lactation the actual dose level administered was generally higher, see table 1 and 2, even with 50 percent reduction in concentration during week 2 and 67 percent reduction in concentration during week 3 and 4 of lactation.
- 3) No significant effects on fertility of males or females at any dose or in any generation was evident. This conclusion is supported by the failure to find dose related effects on the testes weight or on histological examination of the testes. No dose related histological effects were seen in ovaries. There was no dose related differences in the number of second matings or in the time required for cohabitation. The fertility of Fischer 344 rats is not high, 60-79 percent in controls, and the variability of the fertility probably would allow detection of only severe reductions in fertility.
- 4) The lengths of gestation was prolonged by 1 day in approximately one half the F0 dams producing F1b litters only in the highest dose group. This effect could result from delayed implantation, hormonal imbalances, or parturition problems.
- 5) The mean body weights of the F0 generation were statistically significantly reduced compared to controls prior to mating, at the highest dose level. Since body weight gain per gram of food consumed was apparently nearly always less in the high dose group than in the other treatment groups or the controls, the body weight decrease cannot be explained by decreases in food consumption. At this dose level, food consumption was frequently statistically significantly

increased over control values. At the two lowest dose levels, food consumption was generally apparently increased, but it was seldom statistically significant. Thus, the weight reduction probably is real.

- 6) During lactation, the body weights of F0 dams in the high dose group were not consistently reduced and in the middle dose group in the F0 dams lactating for the Flb litters, there were no statistically significant reductions in body weight compared to controls. Note: It was in the mid dose group and during lactation for Flb litters, that the LEL for pup weight depression occurred.
- 7) The body weights of F1 females during gestation and lactation for F2a and F2b litters were infrequently significantly different from control weights (see table 6). After weaning of the F2b litters from week 44-77 were adult F1 female body weights significantly less than control weights for the target dose level of 20 mg/kg. The body weights of male F1 rats were not different from control weights at any time after weaning.
- 8) Pup body weights were significantly reduced over control weights in the Fla and Flb pups only. These reduced pup weights occurred at the highest dose throughout lactation and in the mid dose only toward the end of lactation, and only in the Flb pups. The NOEL was the lowest target dose level administered.
- 9) Pup viability was reduced at parturition and during the first day of lactation in Fla and Flb pups at the target dose level of 80 mg/kg (actual 76.1 to 133 mg/kg/day) only. A reduction in litter size probably also occurred in the highest dose group in the Fla litters. The apparent reduction probably was dominantly due to a decrease in number of female pups born, causing a significant difference in the sex ratio at birth.

Pup viability was more severely and significantly reduced in the Flb litters than in Fla litters at birth and between birth and lactation day 1 in addition to the period between lactation day 1 and lactation day 4. The sex ratio in these Flb pups was normal, probably because male, in addition to female pup viability, was less than in the Fla litters.

- 10) Anomalies and variations occurred in Flb litters of the high dose which died during lactation. This was the only group for which those effects could be determined because it was the only group apparently for which skeletal examinations were conducted. In addition, it was the only group in which a large number of nonscheduled pup deaths occurred.

These skeletal anomalies and reductions in ossification are generally consistent with similar effects produced by 2,4-D in the teratogenicity study in Fischer 344 rats. The NOEL for developmental effects in that study is 25 mg/kg/day.

- 11) The absolute and relative liver weights of F0 males were statistically significantly reduced at all dose levels at terminal sacrifice. The absolute and relative kidney weights of F0 females were statistically elevated over control weights at all dose levels. There was not a "clean" dose-response relationship and the report did not consider the effect on either sex to be biologically significant.

The liver weight reductions seen in the males may not be toxicologically or pharmacologically significant, and could be an artifact of the study.

- a) There was no "smooth" dose response relationship with the liver weight and the dose of the test chemical.
- b) F1 males and females demonstrated no liver weight reductions.
- c) No significant liver weight reductions occurred in a 90-day subchronic or a chronic study conducted at 1, 5, or 45 mg/kg/day in the Fischer 344 rat.
- d) The reductions probably are not due to the slight thyroid effects analogous to the thyroid effects seen in the subchronic and chronic studies, because only higher elevations of T4 than those seen cause glycogen depletion in the liver.

e) The reductions are not due to an interaction of 2,4-D with the liver histological findings seen. The liver weights in control animals with and without focal necrosis, multifocal necrosis, or basophilic alterations were each not different from each other. Similar comparisons failed to detect differences in the highest dose level group.

f) Food consumption apparently increased at all the higher dose levels, and in some cases the increase was statistically significant. Thus, the liver weight reduction is not due a reduction in food consumption.

The statistically significant kidney weight increase in females of the F0 generation probably are not correlated with the kidney histopathology seen the males and female of the subchronic and chronic studies. No kidney histopathology was seen in any animals in the reproduction study. In addition, the kidney weights of 5 females in control animals were an average of 0.18 g for the left or the right kidney, whereas the average kidney weights in the remaining control animals were 0.9 g for the left or the right kidney, approximately 3 standard deviations different. Thus, if these 5 animals are removed from controls, the kidney weights in dosed animals are comparable to controls.

It is concluded that the kidney weight increase is due to an anomaly in the kidney weights of 5 control females, and that it is not due to the test substance.

- 12) No significant dose-related histopathology occurred in any organ at any dose level in any generation.

References:

1. Subchronic toxicity study in Fischer 344 rats conducted by Hazleton Laboratories, Report No. 2184-102, dated September 12, 1983, for the Industry Task Force on 2,4-D Research No. 251474.
Feeding study conducted 90 days at dose levels of 0, 1, 5, 15, or 45 mg/kg/day.
2. Interim 52-week report on 2,4-D chronic feeding/oncogenicity study in Fischer 344 rats. Conducted by Hazleton Laboratories submitted by the Industry Task Force on 2,4-D Research. Accession No. 251019.
Feeding study conducted at 0, 1, 5, 15, or 45 mg/kg/day.
3. Teratogenicity study of 2,4-D in Fischer 344 rats. Conducted at WIL Research Laboratories (WIL-81135) for the Industry Task Force on 2,4-D Research.
Study conducted at 0, 8, 25, or 75 mg/kg/day by gavage.
4. Reproduction study of 2,4-D in Fischer 344 rats. Conducted by WIL Research Laboratories (WIL-81137) for the Industry Task Force on 2,4-D Research. Accession No's. 259442-6.

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